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April 24, 2020

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

*Re: Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS)*

Dear Judge Schofield:

We write on behalf of Plaintiffs in the above-referenced action pursuant to the Court's April 9, 2020 order (the "Order") granting Plaintiffs' motion to compel nonparties Metro-Goldwyn Mayer Studios Inc. and JMBP, LLC (collectively, "the MGM Entities") to make available to Plaintiffs certain unaired video footage from *The Celebrity Apprentice* (Doc. No. 232). Following the Court's Order, on April 10, 2020, MGM contacted Plaintiffs to begin the meet and confer process regarding logistics for production, and Plaintiffs responded with a request to meet and confer concerning both scope and logistics for production. Following a telephonic meet-and-confer on April 20, 2020 and additional correspondence, Plaintiffs and the MGM Entities have agreed that the following footage from the March 22, 2009 and March 27, 2011 episodes of *The Celebrity Apprentice* (the "Relevant Episodes") shall be made available for review, to the extent such footage exists:

- any footage of interactions between the ACN principals and Defendants or their respective agents or representatives;
- any footage, whether of ACN principals or Defendants themselves, including discussion of ACN's business, the opportunity it offered, the products and services it sold, or ACN's relationship with Defendants; and
- any footage concerning what Defendants (or their agents or representatives) said about ACN or directed others to say (or not say) about ACN.

Plaintiffs and the MGM Entities are working cooperatively to identify such footage for ease of review. In that regard, the MGM Entities have agreed to assemble and provide asset lists for the Relevant Episodes, and will provide the same to Plaintiffs by April 28, 2020. Plaintiffs and

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2

the MGM Entities have agreed to work cooperatively to determine whether those materials will streamline the identification and review of the relevant footage.

With respect to the timing and logistics of Plaintiffs' access to the relevant footage, the MGM Entities have represented to Plaintiffs that their offices are closed due to the COVID-19 pandemic and will remain closed at least through Friday, May 15, 2020, if not later. Plaintiffs and the MGM Entities have agreed to continue meeting and conferring in advance of the reopening of the MGM Entities' offices, and jointly and respectfully propose that, during the week of May 18, 2020, they file a joint status update letter apprising the Court of the parties' discussions with respect to the timing and logistics of Plaintiffs' access to the relevant footage.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record (*via* ECF)